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April 16, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Pamela K. Chen, U.S.D.J.
225 Cadman Plaza East
Courtroom 4F North
Brooklyn, NY 11201-1804

Re: IME WatchDog, Inc. v. Gelardi, et al.
Case No.: 1:22-cv-1032 (PKC) (JRC)

Dear Judge Chen:

This firm, together with Milman Labuda Law Group PLLC, represents Plaintiff IME WatchDog, Inc. (the “Plaintiff”) in the above-referenced case. Plaintiff writes jointly with Defendants Safa Abdulrahman Gelardi, Vito Gelardi, and IME Companies LLC (collectively hereinafter the “Defendants”) to respectfully request an extension of time, until May 15, 2024, of the deadline to exchange exhibit lists and witness lists for the hearing scheduled for May 29, 2024.

On March 8, 2024, this Court scheduled a hearing for April 29, 2024 with the deadline to exchange exhibit lists by yesterday, April 15, 2024. See Text Only Order dated March 8, 2024.

On March 19, 2024, this Court granted the parties’ joint letter motion to adjourn the hearing to May 29, 2024. See Text Only Order dated March 19, 2024. However, the deadline to exchange exhibit lists was not addressed therein.

Consistent with ¶ 1(G) of this Court’s Individual Practices and Rules, Plaintiff respectfully submits that: (i) the current deadline to exchange exhibit lists was yesterday, April 15, 2024, and there was no new deadline provided for witness lists; (ii-iii) there have been no previous requests for an extension of time concerning these deadlines; (iv) Defendants join in this request; and (v) the requested extension does not affect any other scheduled Court appearance or deadline to the parties’ knowledge.

The reason for the request is that Plaintiff has issued subpoenas seeking documents in relation to the hearing and has not yet received responses from the various third parties subpoenaed.

As a result, Plaintiff respectfully submits that good cause exists for an extension of time to exchange exhibit lists and witness lists.

Dated: Lake Success, New York
April 16, 2024

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Jamie S. Felsen, Esq.

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*Attorneys for Plaintiff
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Dated: Lake Success, New York
April 16, 2024

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All counsel of record